

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JODIE PIERCE, <i>individually and on behalf of all others similarly situated</i> , Plaintiff, v. CPS Solutions, LLC, Defendant.	Case No. 2:25-cv-00449 District Judge Algernon L. Marbley Magistrate Judge Kimberly A. Jolson
---	---

**DEFENDANT CPS SOLUTIONS, LLC’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE PLEAD TO
PLAINTIFF JODIE PIERCE’S COMPLAINT**

Defendant CPS Solutions, LLC (“CPS”) hereby moves for an extension of time to answer, move, or otherwise plead to the Complaint filed in *Pierce v. CPS Solutions, LLC*, No. 2:25-cv-00449 (S.D. Ohio), until after the Court decides the pending motion to consolidate filed in related actions *Washburn v. CPS, Solutions, LLC*, No. 2:25-cv-00400 (S.D. Ohio) (“Washburn Action”) and *Webber v. CPS, Solutions, LLC*, No. 2:25-cv-00431 (S.D. Ohio) (“Webber Action”). See Washburn Action, Dkt. 3. Plaintiff Pierce does not oppose this motion. No prior extensions of time to respond have been sought or received.

In support of such motion, undersigned counsel states as follows:

1. The Washburn Action was filed on April 14, 2025. The Webber Action was filed on April 18, 2025.
2. On April 24, 2025, the plaintiffs in the Washburn Action and the Webber Action moved to consolidate those cases and any subsequently-filed related cases. See Washburn Action, Dkt. 3. That motion requests that plaintiffs be permitted to file a consolidated complaint

30 days after the court grants consolidation and that CPS' response to any consolidated pleading be due 30 days later. The Washburn and Webber plaintiffs further request that they be granted 30 days to respond to any motion to dismiss, and that CPS be given 21 days to file any reply.

3. This action (the "Pierce Action") was filed on April 24, 2025.
4. CPS does not oppose consolidation of the Washburn Action, Webber Action, and Pierce Action. All three actions have been brought against CPS on behalf of a putative class of individuals who allege they were harmed by a security incident involving CPS' computer systems in December 2024.
5. Counsel for CPS conferred with counsel for Pierce by phone on May 13, 2025. Counsel for Pierce stated that she does not oppose CPS' request to extend its time to move, answer, or otherwise plead until after the Court decides the Washburn and Webber plaintiffs' pending motion to consolidate.
6. On May 14, 2025, this Court granted CPS' corresponding motion to extend its time to move, answer, or otherwise plead in the Washburn Action. See Washburn Action, Dkt. 10.

Accordingly, CPS hereby moves the Court for an order extending its time to move, answer, or otherwise plead to the Complaint in this Pierce Action until after the Court decides the pending motion to consolidate in the Washburn and Webber Actions. A proposed order will be submitted to chambers.

Dated: May 15, 2025

Respectfully submitted,

/s/ Joel E. Sechler

Joel E. Sechler (0076320)
CARPENTER LIPPS LLP
280 North High Street, Suite 1300
Columbus, OH 43215
Telephone: (614) 365-4100
Facsimile: (614) 365-9145
sechler@carpenterlipps.com

*Trial Attorney for Defendant
CPS Solutions, LLC*

Of Counsel

Katheryn M. Lloyd (0075610)
Amber L. Merl (0080655)
CARPENTER LIPPS LLP
280 North High Street, Suite 1300
Columbus, OH 43215
Telephone: (614) 365-4100
Facsimile: (614) 365-9145
lloyd@carpenterlipps.com
merl@carpenterlipps.com

Jennifer S. Windom*
Hogan Lovells US LLP
555 13th Street NW
Washington, D.C. 20004
T. (202) 637-6437
F. (202) 637-5910
jennifer.windom@hoganlovells.com

*pro hac vice pending

Counsel for Defendant CPS Solutions, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Southern District of Ohio using the CM/ECF system. All participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Joel E. Sechler
Joel E. Sechler (0076320)